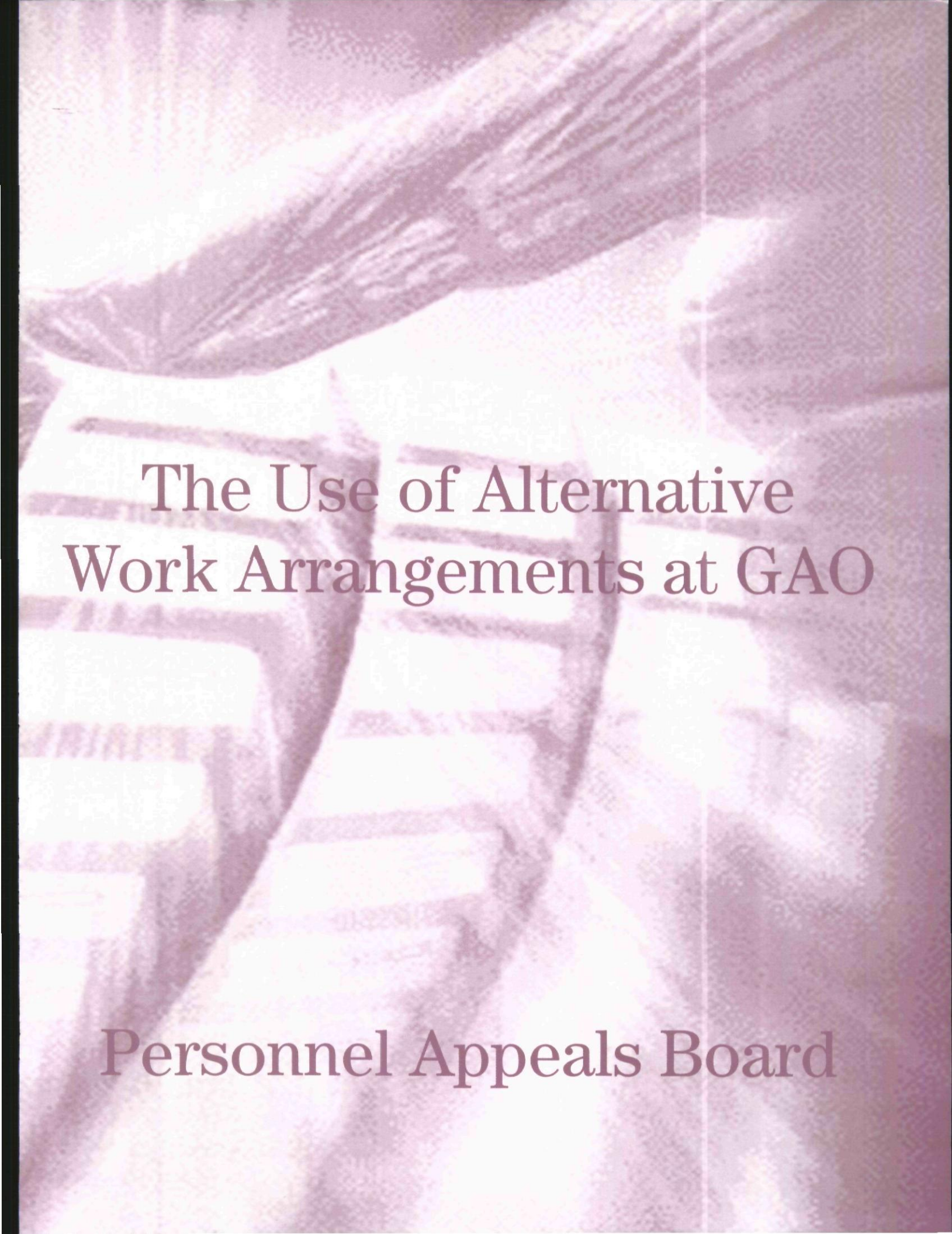

The Use of Alternative Work Arrangements at GAO

Personnel Appeals Board

Personnel
Appeals
Board

March 30, 2001

The Honorable David M. Walker
Comptroller General
United States General Accounting Office
Room 7000
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Walker:

Pursuant to the authority granted to it under the General Accounting Office Personnel Act of 1980, the Personnel Appeals Board has statutory responsibility to oversee equal employment opportunity at GAO. In exercise of that authority, the Board is issuing the attached report on the use of alternative work arrangements at GAO.

The Board's study examined the implementation of the alternative work programs offered at GAO in order to identify potential eeo problems. The Board's findings, conclusions, and recommendations about those programs are contained in the attached report.

Sincerely,

Michael Wolf

Michael Wolf
Chair

attachment

PERSONNEL APPEALS BOARD

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GAO'S ALTERNATIVE WORK ARRANGEMENTS

Background

Introduction

During the past decade, the Federal Government has been advancing the use of non-traditional working arrangements by its workforce. In 1994, 1996, and again in 1999, President Clinton directed agencies in the Executive Branch to expand their ability to provide employees flexible hours and opportunities to telecommute.[1] Originally instituted as a means to reduce commuting and conserve energy resources, the focus of the measures today is to assist employees' attempts to balance work with family responsibilities.

The National Partnership for Reinventing Government assessed Executive Branch progress in 1999 and found that half of all Federal employees were using some form of flexible work schedule.[2] In 1998, the General Services Administration (GSA) reported that 10,000 Federal employees worked at locations other than their principal workplace. The GSA estimates that the number has doubled since then.[3] Some agencies have focused on making part-time employment more available. For instance, the Federal Communications Commission has made it an option for all of its employees.[4]

The U.S. General Accounting Office (GAO or the Agency) permits its employees, under certain circumstances, to make use of alternative work schedules or arrangements. For example, full-time GAO employees may vary their schedules by selecting arrival and departure times as long as their eight hour tour of duty falls within the Agency's core hours (6 a.m. - 7 p.m.). In addition, the Agency offers the following three programs, which are the subject of this oversight study: (1) part-time career employment, which is defined to include employees who work a minimum of 32 hours and a maximum of 64 hours in a two week pay period; (2) maxiflex, which permits employees to work longer hours some days so that they are able to compress their schedules to fewer than10 days in a two week pay period; and (3) flexiplace, which permits employees to work somewhere other than their principal place of business.

Jurisdiction

The General Accounting Office Personnel Act of 1980 (GAOPA) directs the Personnel Appeals Board (PAB or the Board) to oversee equal employment at GAO through review and evaluation of GAO's procedures and practices.[5] Pursuant to this mandate, the Board's Office of Oversight conducts studies of selected issues and prepares evaluative reports. Before selecting an issue for oversight studies, the Board has typically solicited input from GAO employee councils about possible topics. The topics examined in this study were suggested by the Chair of the Women's Advisory Council at a 1997 meeting between the Board and the chairs of the employee organizations. The Personnel Appeals Board decided to undertake this study to identify potential eeo problems in the implementation of alternative work programs. The study covers fiscal years 1994 through 1998 (October 1, 1993 through September 30, 1998).

[1] Presidential Memoranda (July 11, 1994; June 21, 1996; May 24, 1999).

[2] Some agencies reported far higher percentages of employees on flexible or compressed schedules: 75 percent of the Department of Energy workforce; 70 percent at the Environmental Protection Agency; and 85 percent at the Department of Labor are on flexible or compressed schedules. National Partnership for Reinventing Government, *Turning the Key: Progress and Recommendations* (1999).

[3] Examples include 13 percent of the Department of Education's workforce who work at home or in telecommuting centers and 14 percent of the Merit Systems Protection Board. The Departments of Transportation, Labor, Health and Human Services and Defense all have steadily-growing flexiplace programs in place. *Ibid.*

[4] *Ibid.*

[5] 31 U.S.C. §732(f)(2)(A); see applicable regulations at 4 C.F.R. §§28.91 and 28.92.

Methodology

The Board reviewed Federal statutes and regulations governing alternative work schedules, part-time employment, and the use of flexiplace in the Executive Branch. These include the Federal Employees Flexible and Compressed Work Schedules Act of 1978[6] and the Federal Employees Part-Time Career Employment Act,[7] which authorize the use of programs similar to those offered at GAO. Although there is no statute authorizing or prohibiting flexiplace, the Office of Personnel Management (OPM) has administratively sanctioned flexiplace and conducted a 1990 government-wide flexiplace pilot program that allowed 500 Federal employees from 13 agencies the option of working outside a traditional office setting. OPM has also prepared handbooks and instructional materials that offer guidance to Federal agencies in implementing the various alternative work programs. GAO participated in the OPM pilot program and subsequently conducted its own pilot program.[8]

The Board has also reviewed GAO's internal orders that govern participation in its alternative work arrangements programs.[9] This PAB study examines the criteria for participation in each of the Agency's programs to determine the extent to which they define or limit the categories of employees allowed to participate or the work allowed to be performed.[10]

The Board's study also included data-gathering on participation in each of the three programs described. Pursuant to a data request from the Board, the Agency provided numeric and demographic information on employee participation in the flexiplace program, as well as for employees who work part-time.[11] The Agency was also asked to identify requests to participate in flexiplace or to work part-time that were based on reasonable accommodation of a disability. Although those requests can be approved by unit heads, at the time of the study, only the Assistant Comptroller General for Operations could disapprove a request based on reasonable accommodation.

[6] 5 U.S.C. §6101 *et seq.*

[7] 5 U.S.C. §3401 *et seq.*

[8] GAO limited participation in OPM's program to non-evaluators. Established under the Operations Improvement Program, GAO's pilot program included evaluators and those holding evaluator-related positions.

[9] GAO Order 2340.1, Part-Time Career Employment (January 16, 1998); GAO Order 2620.1, GAO Maxiflex Alternative Work Schedules Program (July 31, 1989), revised June 28, 2000; GAO Order 2300.5, Alternative Workplace Arrangements (Flexiplace) (June 15, 1994).

[10] According to a 1997 GAO report that reviewed the implementation of flexiplace programs in the Executive Branch, most had limitations by occupation, by types of work that could be performed, and by a variety of work arrangements. That study's authors reviewed flexiplace arrangements at 26 Federal locations where nearly 100,000 people were employed. The authors estimated that nearly five percent of those employees took advantage of flexiplace or telecommuting arrangements. The report also noted, however, that although nearly half of the employees at the 26 locations were covered by general flexiplace policies, the majority of those employees were then excluded by specific limitations (*e.g.*, occupation) within those policies. *Agencies' Policies and Views on Flexiplace in the Federal Government* (GAO-GGD-97-116).

[11] There is little useful eeo data that can be compiled about maxiflex as it has been used by nearly the entire GAO workforce at one point or another. During the course of the Board's study, employees' schedules were approved by first-line supervisors on a biweekly basis and were not reported to any central body. Schedules are now required to be approved on an annual basis, but can be changed each pay period, with supervisory approval. GAO Order 2620.1.

PAB Survey

The Board also surveyed the GAO workforce to measure the members' level of knowledge about the alternative programs, including eligibility requirements and restrictions, to elicit their perceptions about how the programs operate at GAO, and to identify any barriers that may affect the operation of the programs.[12] As an example of a particular widely-held opinion about the operation of two of these programs, the Chair of the Women's Advisory Council (WAC) told the Board that her constituency believes that their participation in both the flexiplace program and the opportunity to work part-time were "severely restricted" for them and that managers were reluctant to approve either arrangement if they believed the arrangement would be a substitute for child care.[13]

[12] In the 1997 GAO report on flexiplace in the Executive Branch, the authors cited widespread management resistance as the largest barrier to the implementation of flexiplace. This resistance persisted even when managers were confronted with facts that showed that employees who used flexiplace were as or more productive than those who did not. A June 2000 report issued by The PricewaterhouseCoopers Endowment also found a "high level of resistance among management to the teleworking process." *Managing Telecommuting in the Federal Government: An Interim Report.*

[13] With respect to flexiplace, GAO Order 2300.5 states that "[f]lexiplace is not a substitute for dependent care." Ch. 1, §5(f). Explanatory material accompanying the Order cautions that "The employee and his or her family should understand that the home office is just that, a space set aside for the employee to work. Family responsibilities must not interfere (to the extent they are controllable) with work time at home." GAO Order 2300.5 SUP Ch. 1, §f [1-5-f-1]. There is no comparable provision with respect to part-time employment.

GAO Programs

Maxiflex Alternative Work Schedules

GAO's maxiflex program is a form of alternative work schedule that enables employees to complete the 80 hour biweekly pay period in fewer than 10 days and to vary arrival and departure times.[14]

Although maxiflex is not available to members of the Senior Executive Service (SES) or to intermittent employees at GAO, approximately 95 percent of the GAO workforce is eligible to participate in the program as it is applicable to all divisions and offices in GAO. However, if the head of a division or office determines that employee participation in the program would substantially disrupt the functions of an office or cause excessive additional costs to be incurred, an employee or a group of employees may be excluded from the program.[15] First line supervisors are responsible for approving employee schedules and ensuring office coverage. According to the GAO Personnel Office, most of those eligible to participate at GAO have taken advantage of the program at some point in their careers.

Part-Time Career Employment

The part-time employment program at GAO is based on individual requests, although management may designate certain positions as permanent part-time slots. Approval of part-time schedules rests with unit heads, and no groups of employees are excluded. The tour of duty for part-time employees must be no fewer than 16 hours a week, but no more than 32 hours per week. Management retains the discretion to convert a part-time employee to a full-time schedule with notice. However, a full-time employee is not required to accept part-time employment as a condition of continued employment. Part-time employees are also eligible to participate in the maxiflex and flexiplace programs.[16]

Flexiplace

GAO's flexiplace program allows employees to work outside the traditional office setting with no change in official duty station or conditions of employment and the arrangement may be episodic or continuing.[17] GAO was in the forefront of Federal agencies when it participated in a 1990 government-wide flexiplace pilot program sponsored by the Office of Personnel Management; the Agency subsequently conducted its own pilot program. Based on the results of those pilot programs, GAO concluded that "flexiplace is a successful program that works well with employees who are proven performers, is feasible from an organizational viewpoint, and shows promise as an effective mechanism for national efforts regarding work/family, transportation, energy, and quality of life issues."[18]

The GAO Order provides that all full-time and part-time employees are eligible for consideration for flexiplace if they have been (1) rated at least Fully Successful in every category in which they were rated on the most recent performance appraisal, (2) have proven to be dependable, independent, and highly motivated, and (3) have demonstrated an adequate understanding of the operations of the organization.

[14] During the time period of the Board's study, the GAO Order governing maxiflex mandated that work be performed between the hours of 6:00 a.m. and 6:00 p.m. Recent revisions to the Order extended evening core hours to 7:00 p.m. and changed the biweekly schedule approval to annual. GAO Order 2620.1 (June 28, 2000).

[15] The Comptroller General may also suspend maxiflex if he determines that a particular schedule "has had or would have an adverse agency impact," *i.e.*, a reduction in GAO productivity, diminishment in the level of services or an increase in GAO costs. Unit heads are responsible for ensuring adequate staff coverage to carry out the functions of the office. GAO Order 2620.1, ch. 4 ¶1.

[16] GAO Order 2340.1.

[17] Employees on continuing flexiplace must schedule one day a week in the office unless the unit head makes an exception.

[18] GAO Order 2300.5, ch.1 ¶2.

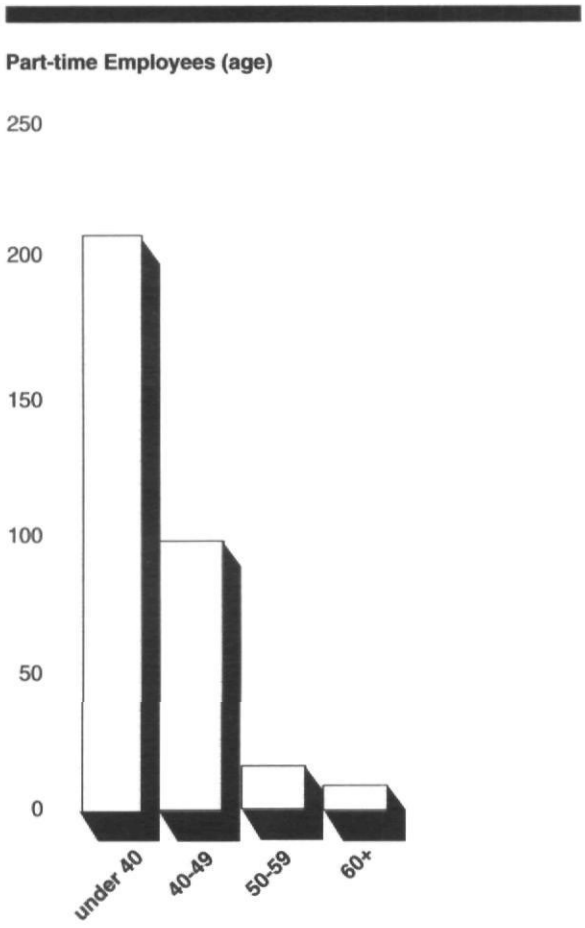
GAO Experience

Demographics on GAO Participation

The Agency reported to the Board that between October 1, 1993 and September 30, 1998, 333 permanent employees worked part-time and 367 employees participated in the flexiplace program. The overwhelming majority of employees who worked part-time were female (301 or 90 percent) and 63 percent were under 40. Of the employees who used flexiplace during that same time period, 60.5 percent were female and 37 percent were under 40.[19] During the five year period in question, attorneys and evaluators constituted 89 percent of the employees who participated in flexiplace and 72 percent of the part-time employees.

The Agency also reported that five employees were permitted to work part-time schedules because of their disabilities or medical conditions. Medical reasons or disabling conditions were also cited by 71 (19.3 percent) of the 367 employees who participated in the flexiplace program.

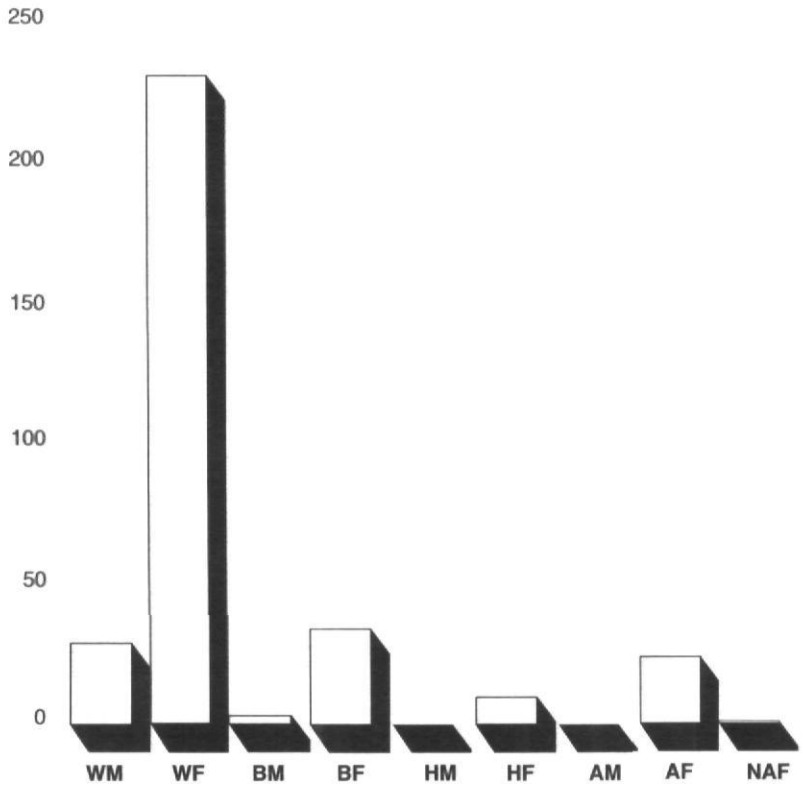
The following charts reflect the breakdown, by race, sex, national origin and age of employees who worked part-time or participated in flexiplace from fiscal year 1994 through fiscal year 1998. For comparison purposes, the last chart shows profiles of the Agency's workforce by race, national origin and gender at the beginning and end of the Board's study.[20]



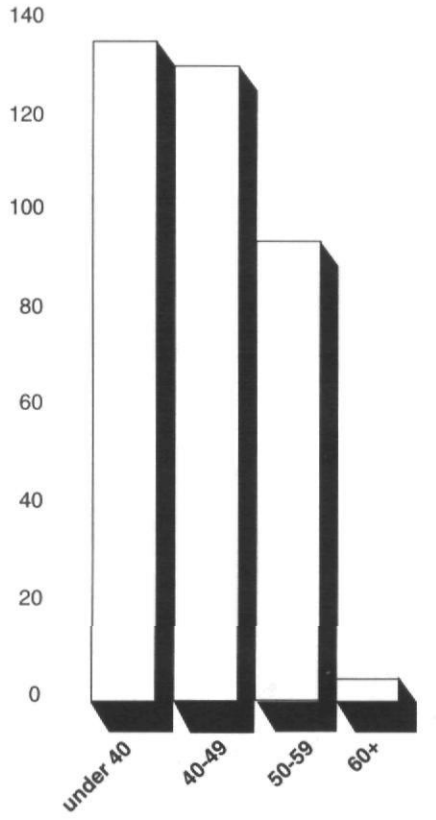
[19] During the Board's study, the Agency's workforce averaged about 46 percent female; approximately a third of the workforce was under 40.

[20] Although the number of GAO employees changed from 4,883 in October 1993 to 3,311 in October 1998, the Agency's eeo profile, by race, gender, and national origin, remained virtually the same.

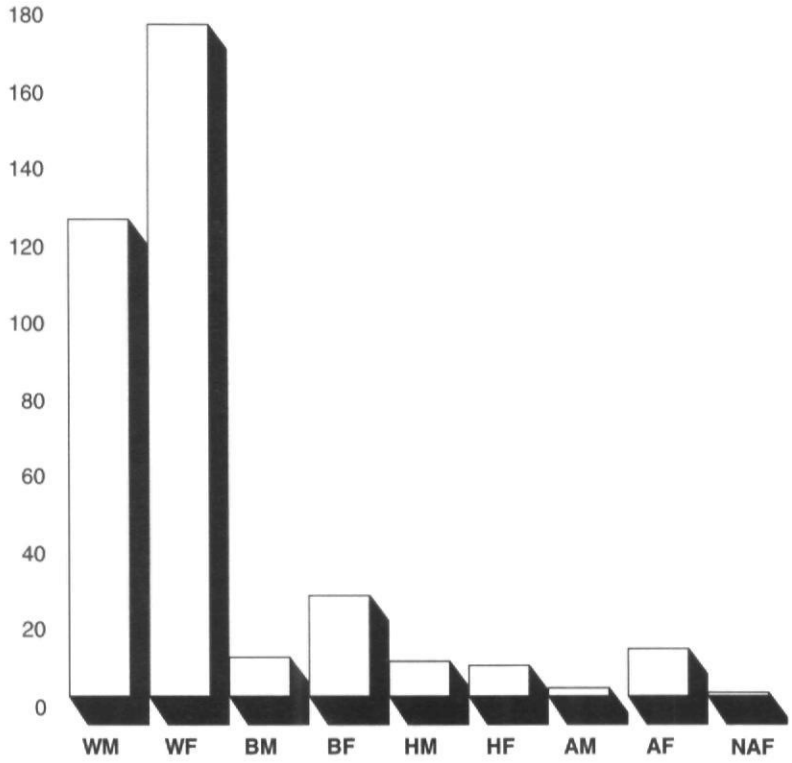
Part-time Employees (race/gender)



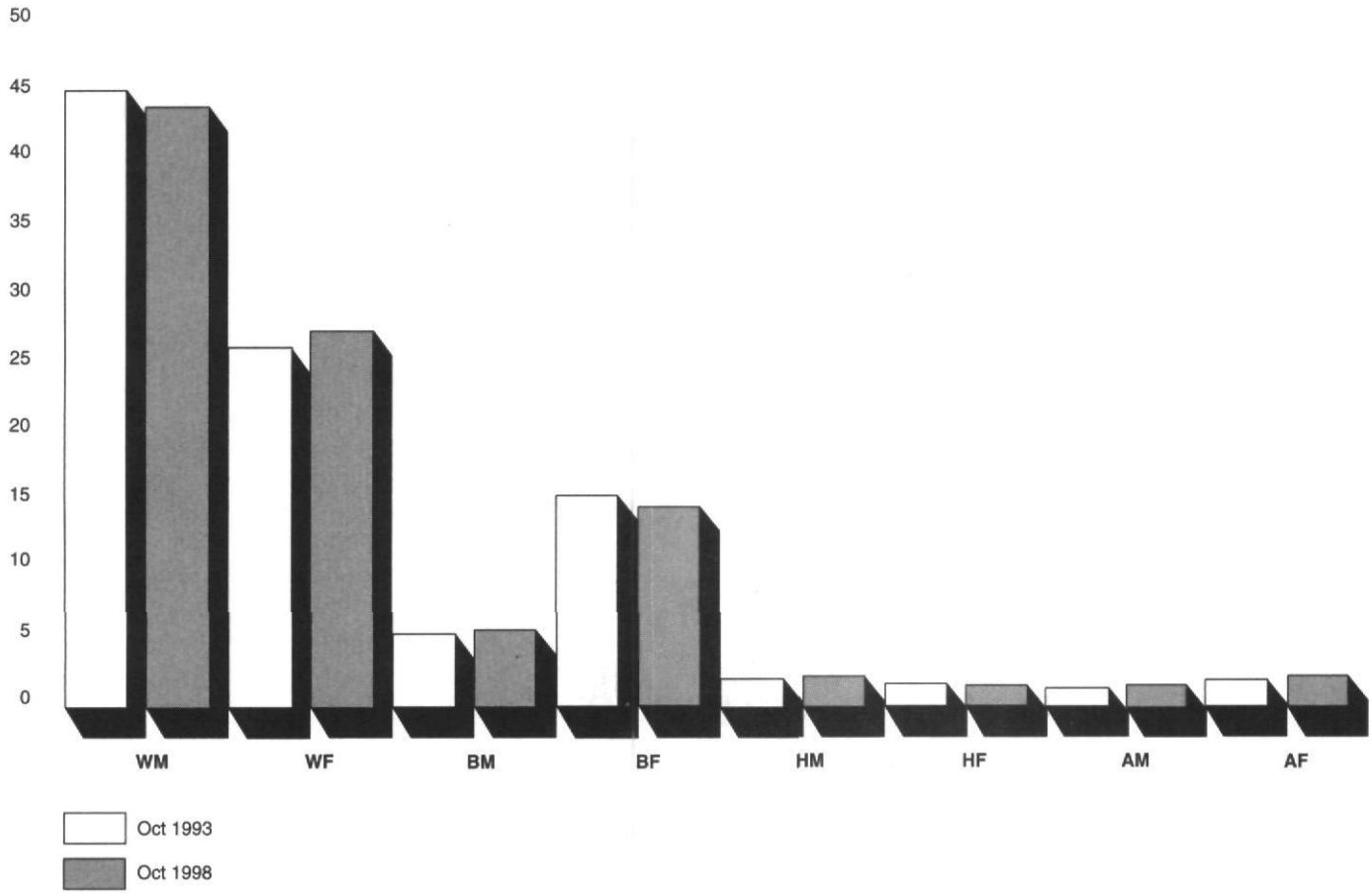
Flexiplace Participants (by age)



Flexiplace Participants (race & gender)



Agency Profiles (by percent)



PAB Survey Results

Almost 1,500 GAO employees responded to the Board's survey. Of those responding, 39.5 percent identified themselves as managers or supervisors,[21] 58.9 percent were evaluators or in evaluator-related positions, and 10.5 percent were in administrative or clerical positions. Another 2.8 percent were attorneys, 4.5 percent held technical positions, and 4.1 percent placed themselves in the "Other" category. Ninety-five percent of the respondents reported that they currently work full-time but 7.5 percent had worked a part-time schedule at some point in the past five years. During that same time period, nearly half of those responding had worked under a maxiflex schedule and 20 percent had worked under a flexiplace arrangement.

In addition, 48.3 percent of the survey respondents were male and 51.7 percent were female. Of the respondents, 82.2 percent were white; 14.3 percent were black; 4.7 percent were Hispanic; and 3.3 percent were Asian. Nearly 6 percent reported a disability and 26.5 percent were under 40 years of age.

In conducting the survey, the Board also obtained and considered anecdotal information submitted by GAO employees about limitations on program participation by Band, Division, Office, and gender.

Part-Time

Sixty percent of the survey respondents reported that they did not know how to go about changing their schedules to part-time.

Nearly half of the employees who had considered working part-time cited reduction in pay as their primary reason for not requesting the change to their schedules. The possible negative effect on promotion potential (41 percent) and the belief that they would not obtain supervisory approval (46 percent) were also factors identified by the respondents.

In addition, 83 percent of the respondents who had worked part-time said that they did so to balance work and family responsibilities. Almost 60 percent of the part-timers said that they believed their schedules had a negative effect on their chances for advancement at GAO. The Agency reported to the Board that 14 part-time employees (4.2 percent of the part-timers) were promoted under the Merit Selection Plan (MSP) during the time period of the Board's study.[22] There were a total of 1,463 promotions during the same five year period, 751 of which were MSP. None was specifically advertised as a part-time position.[23]

Maxiflex

Employees who opted to work a maxiflex schedule also did so in an attempt to balance work and family responsibilities (72 percent). Forty-four percent also cited the reduction in commuting time by travelling during off-peak hours as a reason underlying their choice. Less than15 percent of the maxiflex employees thought that their schedule choice had any negative effect on their opportunities for advancement at GAO. The primary reasons cited for not working compressed schedules were the 9-10 hour length of the non-flex workdays (41 percent) and a belief that their supervisors would not approve them (28 percent).

[21] A supervisor was defined as one who directs and evaluates subordinate employees and a manager was defined as one who directs the work of an organization. Employees who identified themselves as managers or supervisors may also be included in other categories and may have the designation on a temporary basis. Approximately 24 percent of GAO's workforce hold permanent supervisory or managerial positions.

[22] Promotions were frozen at GAO from May 1995 through March 1997. Approximately nine percent of the GAO workforce was promoted during the period of the Board's study. The range, which included the freeze of almost two years, was 7.5 percent to 10.5 percent.

[23] GAO Order 2335.8 states that all full-time and part-time employees are eligible for promotion consideration for evaluator and evaluator-related positions. If selected, the part-time employee is converted to full-time unless the selecting official determines the position can be filled on a part-time basis.

Flexiplace

More than half of the respondents did not know how to arrange to work under flexiplace. The twenty percent of the respondents who had worked under a flexiplace arrangement cited the balance between work and family responsibilities (34 percent), the reduction or elimination of commuting time (41 percent), and medical reasons (24 percent) as the reasons underlying their requests. About 17 percent of those who had been in a flexiplace arrangement believed that it had a negative effect on their promotion opportunities. According to GAO, 101 of the 367 employees (27.5 percent) who participated in flexiplace were promoted during the course of the Board's study.

Among the reasons survey respondents gave for not requesting flexiplace arrangements were a belief that supervisors would not approve them (59 percent), that their division or work group did not allow it (25 percent), and that it would have a negative effect on promotion potential (31.5 percent).

Program Participation

Among the survey respondents whose requests to work part-time or under maxiflex or flexiplace had been denied, 57 percent believed that their supervisors' perceptions of GAO policy concerning the appropriate reasons for participation in one of the programs were incorrect. Seventy-three percent of the respondents whose requests for maxiflex were denied were female. Females comprise about 50 percent of the survey respondents who had worked under maxiflex.[24]

[24] The actual numbers of survey respondents who reported having had requests denied were: 62 for flexiplace; 16 for part-time; and 68 for maxiflex.

Managers and Supervisors

A section of the survey was limited to supervisors and managers at GAO who comprised 39.5 percent of the survey respondents. Of that group, 56.9 percent were male; 43.1 were female. In addition, 81.5 percent were 40 or over and 89.7 percent were white. Three and a half percent reported that they had a disability.

Views on Participation

Of the managers and supervisors who responded, 26 percent believed that their peer group should be excluded from working part-time but only 10 percent believed they should be excluded from the maxiflex program. Again, 26 percent of the respondents believed flexiplace is inappropriate for managers and supervisors and 22 percent would exclude administrative and clerical support staff from those eligible to participate. As previously noted, members of the SES and intermittent employees are precluded from participating in maxiflex; the other programs do not exclude participation by categories of employees.

Views on Granting/Denying Requests

The managers and supervisors also reported that the reason proffered by the staff person requesting an alternative work arrangement usually factors into the decision to grant or deny the request. More than half (55 percent) said that it would depend on the reason while 18.4 percent said that the reason always enters the decision-making process. Another 13 percent considered the reason some of the time and 13.7 percent said that the underlying reason has no effect on the decision. Of the three alternative workplace programs in place at the Agency, only the GAO Order on part-time employment requires the employee to state the reasons for the request.[25] The GAO managers and supervisors who responded to the survey claimed to have denied very few requests for alternative work arrangements.[26]

Views on Flexiplace

Finally, 63 percent of the managers and supervisors who responded to the survey had supervised GAO staff working in a different geographic location, such as field or regional offices, audit sites, or homes. Of those respondents, 86 percent felt that they were able to successfully supervise remote staff. Virtually all the managerial and supervisory respondents believed that their staff would be able to perform at a "fully successful" level in a flexiplace arrangement.

GAO's Own Survey

In 1999, GAO surveyed its workforce in order to obtain employee feedback about a wide range of issues concerning the Agency, its mission, and working conditions.[27] Several of the questions involved GAO's alternative work programs, specifically flexitime and flexiplace. Seventy-four percent of the survey respondents agreed that GAO had the necessary formal programs, initiatives and policies in place to help its employees balance work and personal needs. In addition, 64 percent of the respondents said that field and small office managers support GAO's alternative work schedules and arrangements always or most of the time whereas 42 percent said that Division Managers support the programs always or most of the time and 44 percent said the same about Office of Comptroller General Managers.

[25] It provides that an employee requesting a part-time schedule should proffer "any pertinent information about the reasons for the request." Order 2340.1, ch. 1 ¶ 6.

[26] Nearly 98 percent said they had never denied a request for conversion to part-time; 96.6 percent for maxiflex; and, 96 percent for flexiplace.

[27] The response rate for the 1999 Employee Feedback Survey was 87 percent.

Conclusion

In this study, the Board's purpose was to identify potential eeo problems in the implementation of the alternative work programs offered at GAO. As indicated below, some of the study's findings bear further investigation by the Agency.

Flexiplace

GAO's flexiplace program allows employees to work outside the traditional office setting with no change in official duty station or conditions of employment. All full-time and part-time employees are eligible for consideration for flexiplace if they meet certain suitability criteria. Although management resistance to the concept of telecommuting has been cited in various studies as an impediment to its widespread use, nearly all of the GAO managers and supervisors who responded to the Board's survey indicated that they believed that their staff would be able to perform at a "fully successful" level in a flexiplace arrangement. Because GAO staff assignments are dictated by issue area rather than geography, nearly two-thirds of these respondents had had experience supervising staff in remote locations and 86 percent felt that the arrangements were successful. This suggests that GAO's structure, during the time of the Board's study, was conducive to a flexiplace program. Although the Board received some anecdotal reports from employees who were dissatisfied with their inability to obtain flexiplace arrangements, those complaints generally did not raise eeo issues.

Finally, the Board was unable to determine whether there may be eeo problems in the granting or denying of requests for flexiplace because, in response to a Board request, the Agency stated that data on the denial of requests was not available.

Maxiflex

GAO's maxiflex program is available to employees in all divisions and units in GAO, except for members of the Senior Executive Service and intermittent employees. First line supervisors are responsible for approving employee schedules, which as of June 2000 are submitted for approval on an annual, rather than biweekly, basis. Although the survey indicated that participation in that program was roughly split between males and females, 73 percent of the survey respondents whose requests for maxiflex were denied were female. Because GAO does not maintain data on the maxiflex program, the Board was unable to determine whether this denial rate reflected an impermissible bias by decision-makers.

Further, the overall lack of data reflecting the number of applicants, rejections, and number of participants in the program greatly impedes tracking the success and fairness of the maxiflex program. Without that data, the Board cannot assess whether the program is being administered equitably across all racial, gender and age groups. The Board recommends that the Agency maintain such data and monitor the participation in the program to ensure that there has not been any bias in its administration.

Part-time

The part-time employment program at GAO is based on individual requests, although management may designate certain positions as permanent part-time slots. Approval of part-time schedules rests with unit heads, and no groups of employees are excluded. Of the 333 employees who worked part-time during the course of the study, 90 percent were female. Only 14 of the part-time employees were promoted during the five-year period of this study. None of the promotional opportunities offered during that period was designated for part-time employment.

A majority of the part-timers who responded to the survey believed that their choice of schedule would have a negative effect on chances for advancement and 41 percent of the overall respondents claimed that they chose not to work part-time for that reason. In fact, while the Agency's promotion rate during the period of the study was approximately nine percent, only 4.2 percent of the part-time employees were promoted. Because GAO does not maintain data on denials of requests for part-time schedules, the Board does not have sufficient data to conclude that this disparity signifies an eeo problem. The Board recommends that the Agency undertake an inquiry to determine whether the lower promotion rate for part-time employees is a product of bias against those employees or exists for non-discriminatory reasons. If the inquiry reveals that the low number of part-time promotions is a result of a lower application rates then the Agency should ascertain the causes of the reduced application rate and decide whether additional education of employees is necessary to ensure that employees are fully informed about their rights in the part-time employment program.

As a general matter, the lack of GAO data hampered the Board's ability to fully evaluate the programs. In particular, information about rejections of employee requests for participation in the three programs was not available. In addition, data does not currently exist on the number of employee requests to alter work schedules. The Board recommends that the Agency expand the data it collects relating to the three programs and monitor that data on a regular basis to ensure fair and equitable implementation.

Based on the survey results, the Board found that there appears to be a general lack of information about all three alternative work arrangements. For example, more than half of the respondents did not know how to convert to a part-time schedule or to a flexiplace arrangement. The Agency was in the forefront in establishing programs that assist employees in balancing their personal and professional lives. It should ensure that both staff and management are educated about the intricacies and workings of these programs in order to maximize the benefits they bring to both the Agency and its employees.

Personnel Appeals Board

Survey on the Use of Alternative Work Schedules & Workplaces at GAO

Introduction

The Personnel Appeals Board hears appeals from GAO employees in cases involving prohibited personnel practices, discrimination, and prohibited political activity. The Board also has eeo oversight responsibility for GAO which it exercises through review of regulations, procedures, and practices to assess their effect on equal employment opportunity at GAO. In furtherance of its oversight mandate, the Board has undertaken a study to determine whether decisions about participation in the alternative work schedules programs (maxiflex and part-time) and the alternative workplace arrangements program (flexiplace) at GAO are based, in whole or in part, on gender, race, national origin, age or disability considerations.

This survey is an essential part of the data collection portion of the Board's study. It was designed to assess GAO employees' level of knowledge about the three programs, including eligibility requirements and restrictions; to discern perceptions about how these programs operate at GAO; and to identify any barriers that may be limiting participation in any of the three programs.

This survey is being distributed to all GAO employees and is anonymous (*i.e.*, no ID number or other specific identifying information is requested). Survey results will be used in the report that the Board will publish at the conclusion of its study.

Please return the survey to the following address within 10 days of receipt. For interoffice mail, the address is:

Personnel Appeals Board
UCP II, Suite 560

The mailing address is:

Personnel Appeals Board
U.S. General Accounting Office
UCP II, Suite 560
441 G Street, N.W.
Washington, D.C. 20548

This survey should take about 10-12 minutes to complete. If you have any questions, please call Gail Gerebenics at 2-7503.

Thank you for your help.

Part I - Work Background and Work Schedule

1. Do you work in a division, a region, a staff office, or some other location? *(Check one.)*

   1. ☐ Division
   2. ☐ Region
   3. ☐ Staff office
   4. ☐ Other - Specify: _____

2. Which of the following best describes your job at GAO? *(Check one.)*

   1. ☐ Manager or supervisor
   2. ☐ Evaluator or evaluator related position
   3. ☐ Attorney
   4. ☐ Administrative or clerical support
   5. ☐ Technical position (e.g., computer technician)
   6. ☐ Other - Specify: _____

Part-Time

3. Do you know how to go about changing your schedule to become a part-time employee? *(Check one.)*

   1. ☐ Yes
   2. ☐ No

4. Do you currently work full-time or part-time? *(Check one.)*

   1. ☐ Full-time (at least 80 hours per pay period)
   2. ☐ Part-time (no more than 64 hours per pay period)

NOTE: Many of the following questions ask about the past 5 years. If you have been employed at GAO for less than 5 years, answer the questions for the time you have worked at GAO and indicate approximately how long you have worked at GAO. _____

5. At any time within the past 5 years, have you worked part-time at GAO? *(Check one.)*

   1. ☐ No → Go to question 6.
   2. ☐ Yes → 5a. What is (was) your reason(s) for working a part-time schedule? *(Check all that apply.)*

      1. ☐ To balance work and family responsibilities
      2. ☐ To reduce commuting time by travelling to work during off peak hours
      3. ☐ To be able to be involved in volunteer activities or hobbies
      4. ☐ To take advantage of educational opportunities
      5. ☐ For health-related reasons
      6. ☐ Other - Specify: _____

   5b. To what extent, if at all, do you believe your part-time schedule had a negative effect on your chances on advancement at GAO? *(Check one.)*

      1. ☐ To little or no extent
      2. ☐ To some extent
      3. ☐ To a moderate extent
      4. ☐ To a great extent
      5. ☐ To a very great extent

      ---

      6. ☐ No basis to judge

6. Over the past 5 years, have you ever considered requesting a part-time schedule but decided against it for some reason? *(Check one.)*

   1. ☐ No
   2. ☐ Yes → 6a. What is (was) your reason(s) for not requesting a part-time schedule? *(Check all that apply.)*

      1. ☐ Did not want reduced pay
      2. ☐ It would have cost me more for health benefits
      3. ☐ My annuity computation would be reduced
      4. ☐ My qualification requirements would be prorated
      5. ☐ I felt it would have negatively affected my ability to be promoted
      6. ☐ I felt my supervisor would not have approved it
      7. ☐ Other - Specify: _____

7. **At any time** during the period that you have been employed at GAO, have you ever requested a part-time work schedule **and your request was denied**? *(Check one.)*

   1. ☐ Yes → Continue with question 8.
   2. ☐ No → Skip to question 10.

8. What reason(s) were given to you for the denial of your request for a part-time work schedule? *(Check all that apply.)*

   1. ☐ Office coverage would be reduced
   2. ☐ The type of work you perform required a full-time schedule
   3. ☐ It would have an adverse effect on office productivity
   4. ☐ It would increase the cost to the agency
   5. ☐ It would cause other staff to request a part-time schedules
   6. ☐ Other - Specify: _____

9. Do you believe that the reason(s) given for the denial of your part-time request were reasonable? *(Check one.)*

   1. ☐ Yes
   2. ☐ No → Why not? _____

   _____

Maxiflex

10. Do you know how to go about changing your schedule to work under a **"maxiflex schedule"** (i.e., a compressed schedule of fewer than 10 workdays per pay period) ? *(Check one.)*

    1. ☐ Yes
    2. ☐ No

11. At any time during the past 5 years at GAO, have you worked under a maxiflex schedule? *(Check one.)*

    1. ☐ No → Skip to question 14.
    2. ☐ Yes → 11a. Are you currently working under a maxiflex schedule? *(Check one.)*

       1. ☐ No
       2. ☐ Yes

12. What is (was) your reason(s) for working a maxiflex schedule? *(Check all that apply.)*

    1. ☐ I liked the idea of working less than 10 days in a pay period
    2. ☐ To balance work and family responsibilities
    3. ☐ To reduce commuting time by travelling to work during off peak hours
    4. ☐ To be able to be involved in volunteer activities or hobbies
    5. ☐ To take advantage of educational opportunities
    6. ☐ For health-related reasons
    7. ☐ Other - Specify: _____

13. To what extent, if at all, do you believe your maxiflex schedule had a negative effect on your chances on advancement at GAO? *(Check one.)*

    1. ☐ To little or no extent
    2. ☐ To some extent
    3. ☐ To a moderate extent
    4. ☐ To a great extent
    5. ☐ To a very great extent

    ---

    6. ☐ No basis to judge

14. Over the past 5 years, have you ever considered requesting a maxiflex schedule but decided against it for some reason? *(Check one.)*

    1. ☐ No
    2. ☐ Yes → 14a. What is (was) your reason(s) for not requesting a maxiflex schedule? *(Check all that apply.)*

        1. ☐ The length of the non-flex days are too long
        2. ☐ I have child or family care obligations that I could not have met
        3. ☐ A maxiflex schedule would not be compatible with the type or work I perform
        4. ☐ I felt that my supervisor would not have approved it
        5. ☐ I felt it would have negatively affected my ability to be promoted
        6. ☐ Other - Specify: _____

15. **At any time** during the period that you have been employed at GAO, have you ever requested a maxiflex work schedule **and your request was denied**? *(Check one.)*

    1. ☐ Yes → Continue with question 16.
    2. ☐ No → Skip to question 18.

16. What reason(s) were given to you for the denial of your request for a maxiflex work schedule? *(Check all that apply.)*

    1. ☐ Office coverage would be reduced
    2. ☐ The type of work you perform required you to work a 10 day pay period
    3. ☐ It would have an adverse effect on office productivity
    4. ☐ It would increase the cost to the agency
    5. ☐ It would cause other staff to request a maxiflex schedule
    6. ☐ Other - Specify: _____

17. Do you believe that the reason(s) given for the denial of your maxiflex request were reasonable? *(Check one.)*

    1. ☐ Yes
    2. ☐ No → Why not? _____

        _____

Flexiplace

18. Do you know how to go about changing your schedule to work under a **"flexiplace arrangement "** (i.e., working a portion of the pay period at some place other than a GAO office or audit site, such as at home or at a telecommuting center)? *(Check one.)*

    1. ☐ No
    2. ☐ Yes

19. *Are you aware that there are criteria for participation in the flexiplace program? (Check one.)*

1. ☐ No
2. ☐ Yes → 19b. Do you know what these criteria are or where to find out this information? *(Check one.)*

1. ☐ No
2. ☐ Yes

20. At any time during the past 5 years at GAO, have you worked under a flexiplace arrangement? *(Check one.)*

1. ☐ No → Skip to question 23.
2. ☐ Yes → 20a. Are you currently working under a flexiplace arrangement? *(Check one.)*

1. ☐ No
2. ☐ Yes

Please indicate where you work(ed): _____

21. What is (was) your reason(s) for working under a flexiplace arrangement? *(Check all that apply.)*

1. ☐ I liked the idea of working outside of GAO for some portion of my work period
2. ☐ To balance work and family responsibilities
3. ☐ To reduce or eliminate commuting time
4. ☐ For health-related reasons (i.e., medical necessity)
5. ☐ Other - Specify: _____

22. To what extent, if at all, do you believe your flexiplace schedule had a negative effect on your chances on advancement at GAO? *(Check one.)*

1. ☐ To little or no extent
2. ☐ To some extent
3. ☐ To a moderate extent
4. ☐ To a great extent
5. ☐ To a very great extent

---

6. ☐ No basis to judge

23. Over the past 5 years, have you ever considered requesting a flexiplace arrangement but decided against it for some reason? *(Check one.)*

1. ☐ No
2. ☐ Yes → 23a. What is (was) your reason(s) for not requesting a flexiplace arrangement? *(Check all that apply.)*

1. ☐ I do not meet the necessary criteria
2. ☐ I lack the equipment/facilities necessary to perform my job
3. ☐ A flexiplace arrangement would not be compatible with the type or work I perform
4. ☐ I felt that my supervisor would not have approved it
5. ☐ I felt it would have negatively affected my ability to be promoted
6. ☐ There would be no ability for adequate supervision
7. ☐ There would be no ability for worksite inspection by GAO
8. ☐ My division or work group does not allow flexiplace
9. ☐ Other - Specify: _____

24. **At any time** during the period that you have been employed at GAO, have you ever requested a flexiplace work arrangement **and your request was denied**? *(Check one.)*

1. ☐ Yes → Continue with question 25.
2. ☐ No → Skip to question 27.

25. What reason(s) were given to you for the denial of your request for a flexiplace work arrangement? *(Check all that apply.)*

1. ☐ Office coverage would be reduced
2. ☐ The type of work you perform required you to work a GAO office location
3. ☐ It would have an adverse effect on office productivity
4. ☐ It would increase the cost to the agency
5. ☐ I did not meet the program criteria
6. ☐ Remote supervision was not feasible
7. ☐ I lack the office equipment to do my work
8. ☐ It would cause other staff to request a flexiplace arrangement
9. ☐ Other - Specify: _____

26. Do you believe that the reason(s) given for the denial of your flexiplace request were reasonable? *(Check one.)*

1. ☐ Yes
2. ☐ No → Why not? _____

_____

Answer the following question **only if you have been denied** a part-time work schedule, a maxiplace work schedule, **or** a flexiplace work arrangement.

27. Do you believe that your supervisor's perception of GAO policy concerning the appropriate reasons for participation in a part-time work schedule, a maxiplace work schedule, **or** a flexiplace work arrangement was correct or incorrect when he/she denied your request? *(Check one.)*

    1. ☐ Correct
    2. ☐ Incorrect → Please explain why you believe it was incorrect. _____

    _____

    _____

Part II - Supervisory/Managerial Issues

For the purposes of this survey, we define a supervisor as one who directs and evaluates subordinate employees and a manager as one who directs the work of an organization.

28. Are you currently a supervisor or manager as defined above? (Check one.)

    1. ☐ Yes → ***Continue with question 29.***
    2. ☐ No → ***Skip to question 47.***

29. Approximately how many staff do you supervise or manage? *(Enter number.)*

    _____ staff

Part-time

30. Of the staff you supervise or manage, how many work part-time? (Part-time is less than 64 hours a pay period.) *(Enter number. If none, enter zero.)*

    _____ part-time staff

31. According to your understanding of GAO policy on part-time employment, is it meant to be a permanent assignment/schedule or an episodic/temporary schedule? *(Check one.)*

    1. ☐ A permanent assignment/schedule
    2. ☐ An episodic/temporary schedule
    3. ☐ Do not know

32. Have you ever denied requests from your staff for conversion to a part-time schedule? *(Check one.)*

1. ☐ No
2. ☐ Yes → 32a. What was your reason(s) for denial of the request(s)? *(Check all that apply.)*

    1. ☐ Office coverage would have been reduced
    2. ☐ The type of work staff performed required a full-time schedule
    3. ☐ It would have had an adverse effect on office productivity
    4. ☐ It would have increased the cost to the agency
    5. ☐ It would have caused other staff to request part-time schedules
    6. ☐ Other - Specify: _____

33. Of the staff that you currently supervise or manage, in your opinion, how many would **not** be able to perform at a "fully successful" level on a part-time schedule? *(Enter number. If none, enter zero.)*

_____ staff

34. Do you believe that any of the following categories of employees should be **excluded** from working part-time? *(Check all that apply.)*

1. ☐ Managers or supervisors
2. ☐ Evaluators or evaluator related positions
3. ☐ Attorneys
4. ☐ Administrative or clerical support staff
5. ☐ Technical positions (e.g., computer technician)
6. ☐ Other - Specify: _____

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7. ☐ **None of the above should be excluded from working part-time**

Maxiflex

35. Of the staff you supervise or manage, how many work on a **maxiflex** schedule (i.e., a compressed schedule of fewer than 10 workdays per pay period) *(Enter number. If none, enter zero.)*

_____ staff work on a maxiflex schedule

36. According to your understanding of GAO policy on maxiflex, is it meant to be a permanent assignment/schedule or an episodic/temporary schedule? *(Check one.)*

1. ☐ A permanent assignment/schedule
2. ☐ An episodic/temporary schedule
3. ☐ Do not know

37. Have you ever denied requests from your staff for conversion to a maxiflex schedule? *(Check one.)*

1. ☐ No
2. ☐ Yes → 37a. What was your reason(s) for denial of the request(s)? *(Check all that apply.)*

    1. ☐ Office coverage would have been reduced
    2. ☐ The type of work staff performed required a normal schedule
    3. ☐ It would have had an adverse effect on office productivity
    4. ☐ It would have increased the cost to the agency
    5. ☐ It would have caused other staff to request maxiflex schedules
    6. ☐ Other - Specify: _____

38. Of the staff that you currently supervise or manage, in your opinion, how many would **not** be able to perform at a "fully successful" level on a maxiflex schedule? *(Enter number. If none, enter zero.)*

_____ staff

39. Do you believe that any of the following categories of employees should be **excluded** from working on a maxiflex schedule? *(Check all that apply.)*

1. ☐ Managers or supervisors
2. ☐ Evaluators or evaluator related positions
3. ☐ Attorneys
4. ☐ Administrative or clerical support staff
5. ☐ Technical positions (e.g., computer technician)
6. ☐ Other - Specify: _____

---

7. ☐ **None of the above should be excluded from working on a maxiflex schedule**

Flexiplace

40. Of the staff you supervise or manage, how many work on a **flexiplace** arrangement (i.e., working a portion of the pay period at some place other than a GAO office or audit site, such as at home or at a telecommuting center) *(Enter number. If none, enter zero.)*

_____ staff work on a flexiplace arrangement

41. According to your understanding of GAO policy on flexiplace, is it meant to be a permanent assignment/schedule or an episodic/temporary schedule? *(Check one.)*

1. ☐ A permanent assignment/schedule
2. ☐ An episodic/temporary schedule
3. ☐ Do not know

42. Have you ever denied requests from your staff for conversion to a flexiplace arrangement? *(Check one.)*

1. ☐ No
2. ☐ Yes → 37a. What was your reason(s) for denial of the request(s)? *(Check all that apply.)*

1. ☐ Office coverage would have been reduced
2. ☐ The type of work staff perform require them to be at the office
3. ☐ It would have had an adverse effect on office productivity
4. ☐ It would have increased the cost to the agency
5. ☐ It would have caused other staff to request flexiplace arrangements
7. ☐ There would be no ability for worksite inspection by GAO
8. ☐ My division or work group does not allow flexiplace
9. ☐ Other - Specify: _____

43. Of the staff that you currently supervise or manage, in your opinion, how many would **not** be able to perform at a "fully successful" level on a flexiplace arrangement? *(Enter number. If none, enter zero.)*

_____ staff

44. Do you believe that any of the following categories of employees should be **excluded** from working on a flexiplace arrangement? *(Check all that apply.)*

1. ☐ Managers or supervisors
2. ☐ Evaluators or evaluator related positions
3. ☐ Attorneys
4. ☐ Administrative or clerical support staff
5. ☐ Technical positions (e.g., computer technician)
6. ☐ Other - Specify: _____

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7. ☐ **None of the above should be excluded from working on a flexiplace arrangement**

45. In general, does the reason given by the staff member for requesting either a part-time schedule, a maxiflex schedule, or a flexiplace arrangement enter in your decision to grant or deny a request? (Check one.)

1. ☐ In all cases
2. ☐ In some cases
3. ☐ In no cases

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4. ☐ It would depend on the reason/circumstances involved

46. Do you now supervise or have you, in the past 5 years, supervise GAO staff who worked at a different geographic location from you (e.g., a field or regional office, an audit site, at home, etc.)? *(Check one.)*

1. ☐ No
2. ☐ Yes → To what extent, if at all, do you believe you were successful in supervising this staff member(s). *(Check one.)*

    1. ☐ To a very great extent
    2. ☐ To a great extent
    3. ☐ To a moderate extent
    4. ☐ To some extent
    5. ☐ To little or no extent

Optional

47. Are you . . . ? *(Check one.)*

1. ☐ Male
2. ☐ Female

48. What is your age? *(Check one.)*

1. ☐ Less than 30
2. ☐ 30 to less than 40
3. ☐ 40 to less than 50
4. ☐ 50 to less than 60
5. ☐ 60 or older

49. What is your race? *(Check one.)*

1. ☐ African-American (Black)
2. ☐ Caucasian (White)
3. ☐ Asian-Pacific Islander
4. ☐ Native American

50. Are you of Hispanic origin? *(Check one.)*

1. ☐ Yes
2. ☐ No

51. What is your disability status? *(Check one.)*

1. ☐ None
2. ☐ Non-severe
3. ☐ Severe

Thank you for your assistance.
Please return your survey to the address on page 1.

United States General Accounting Office
Washington, DC 20548

October 11, 2000

Ms. Gail Gerebenics
Director, EEO Oversight
Personnel Appeals Board
U. S. General Accounting Office
820 1st Street, N.E., Suite 560
Washington, D.C. 20548

Dear Ms. Gerebenics:

This is in response to your September 8, 2000, letter submitting a draft report from the Personnel Appeals Board (PAB) on Potential EEO Problems in the Alternative Work Programs at GAO. In addition to the following comments, the attachment provides detailed comments and suggestions to improve the accuracy and clarity of the report.

The PAB undertook the study to identify potential EEO problems in the implementation of alternative work programs. The PAB report describes the Maxiflex alternative work schedules, the part-time employment and the Flexiplace programs as well as presents the results from its survey of GAO employees regarding these programs. While the PAB did not find any specific problems in the implementation of the programs, it recommends that GAO (1) maintain and monitor data on requests, approvals and denials associated with the programs, (2) analyze the application and promotion rates for part-time employees, and (3) provide more information to staff and managers on the alternative work programs.

The survey results were vague and not very helpful in determining whether there were EEO problems in the implementation of the alternative work programs. The report states that almost 1,500 GAO employees responded to the survey, cites the numbers of respondents by work group (i.e. managers or supervisors, attorneys, evaluators), and identifies the numbers of respondents who had experience with the various alternative work schedule programs. However, the EEO profile of the survey respondents was not provided. The report only includes gender data for the Maxiflex program and the gender, race and age data of the supervisors and managers who responded to the survey. Additionally, the report states that 73%, or 49, of the 68 respondents whose requests for Maxiflex were denied were female and also notes that Maxiflex has been used by nearly everyone in GAO. This information makes it difficult to determine if there have been EEO problems.

One of the report's recommendations concerns managers' and employees' lack of information about the programs. This finding is surprising because these are not new programs. GAO's Maxiflex program has been in effect for more than 20 years. Recently, in

a September 28, 2000 memo, the Comptroller General reminded managers and staff that he fully supported the program and stated that Maxiflex is an important tool in helping employees balance their work and family responsibilities. Like the Maxiflex program, GAO's part-time employment program has existed for more than 20 years. As for the Flexiplace program, it began 7 years ago and was implemented as soon as government wide guidance became available. Furthermore, since the data for this report was gathered, orders and fact-sheets describing these programs have been made available to employees and managers via the Personnel website. We will, however, take additional steps to increase managers' and employees' knowledge about these programs by including information about the programs in the new employee orientation session and the training programs for new managers and supervisors. Additionally, we will periodically brief managers on these programs and their responsibilities.

The report also recommends that GAO analyze the application and promotion rates for part-time employees. We reviewed the application and promotion rates for the 5 MSP cycles (promotion cycles) covered by the study. Part-timers represented 2.2 percent of the applicants and 1.9 percent of those promoted. The difference is not statistically significant. Notwithstanding those findings, we will continue to monitor this trend and will include an analysis of part time employees' participation rates and selection rates as part of our annual promotion process reviews.

As for the report's recommendation that GAO maintain and monitor data on requests, approvals, and denials associated with the programs in order to ensure fair and equitable implementation, we don't see a basis for changing our processes to this extent. The report does not present convincing evidence of a problem nor has this issue been raised as a significant concern to GAO's management or to the PAB from GAO employees. Furthermore, the implementation of a data gathering and monitoring process would present a heavy administrative burden. To accurately measure the program requests, approvals, and denials, would create additional paperwork and involve many more managers in the process. We do not believe these steps are warranted. We would, however, find it useful to gather information on denials of requests to convert to part-time or to use the Flexiplace program. We do not believe that gathering information on the Maxiflex program is needed since the report noted that the program has been used by nearly the entire GAO population. Additionally, we will periodically seek employees' views on these programs through our Employee Advisory Council, the employee feedback survey, focus groups and other means, as appropriate.

The steps taken and planned demonstrate GAO's commitment to these programs and to ensuring that they are implemented fairly.

Sincerely yours,

John H. Luke
Chief Human Capital Officer

Enclosure

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APPENDIX III: BOARD COMMENTS ON AGENCY RESPONSE

1) GAO's October 11, 2000 response to the Board's draft report states that the survey results contained in that report were "vague and not very helpful in determining whether there were EEO problems in the implementation of the alternative work programs." The Board would note as follows: 1) throughout its report, the Board made clear that, "[a]s a general matter, the lack of GAO data hampered the Board's ability to fully evaluate the [alternative work arrangements] programs[;]" 2) as to the flexiplace program, the report states that "the Board was unable to determine whether there may be eeo problems in the granting or denying of requests for flexiplace because, in response to a Board request, the Agency stated that data on the denial of requests was not available[;]" 3) as to the maxiflex program, the report states "[b]ecause GAO does not maintain data on the maxiflex program, the Board was unable to determine whether this denial rate reflected an impermissible bias by decisionmakers[;]" the report went on to say that "the overall lack of data reflecting the number of applicants, rejections, and number of participants in the program greatly impedes tracking the success and fairness of the maxiflex program. Without that data, the Board cannot assess whether the program is being administered equitably across all racial, gender and age groups[;]" and 4) as to the part-time program, the report states "[b]ecause GAO does not maintain data on denials of requests for part-time schedules, the Board does not have sufficient data to conclude that this disparity [a full-time promotion rate of approximately nine percent versus a part-time promotion rate of 4.2 percent] signifies an eeo problem."

2) At GAO's suggestion, the report now includes the eeo profile for the survey respondents.

3) With regard to part-time employment at GAO, the Board's report noted that no vacancy announcements at GAO are designated as part-time. The Agency's response does not state that such designations will be made in the future. According to officials at the Office of Personnel Management, such designations have been made in the Executive Branch since the enactment of the Federal Employees Part-time Career Employment Act of 1978 (5 U.S.C. §3401 *et seq.*). In addition, a part-time job search component was

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added to the OPM online job listing for the Federal government in 1999. On average, 4 percent of vacancy announcements government-wide are for part-time jobs. The Board believes that GAO should conform its personnel practices with regard to job announcements to those of the Executive Branch in order to facilitate the hiring and promoting of part-time employees.

4) In its response, GAO states that it has "reviewed the application and promotion rates for the ...[five promotion cycles] covered by the study" and that "[p]art-timers represented 2.2 percent of the applicants and 1.9 percent of those promoted." The response goes on to conclude that the difference is not statistically significant. Based on information provided by the Agency itself, the Board continues to think that further review by GAO is appropriate. The Agency reported to the Board that 333 permanent employees, 90% of whom were female, worked part-time in 26 different job series during the course of the Board's study. Of those, the Agency reported that 14 were promoted, with those promotions occurring in four evaluator job series. This paucity of promotions lends support to employees' perception that part-time work is not seen as having the same career opportunities as full-time employment. The Board remains concerned that 41 percent of the survey respondents believe that working part-time would have a negative effect on their promotional opportunities and that 60 percent of those who work part-time believe that their part-time status has had a negative effect on their promotion opportunities. These perceptions may be the underlying reasons for the fact that there are so few applicants for part-time positions. Having a percentage of job vacancy announcements (both for hires and promotions) designated as part-time might, at the very least, help alleviate the perception of employees that part-time work is limiting in terms of promotion.

5) In its response, GAO states that "[t]he report does not present convincing evidence of a problem..." that would merit the Agency's maintaining and monitoring data on "requests, approvals, and denials associated with the [various] programs...." The Agency did agree "to gather information on denials of requests to convert to part-time or to use the Flexiplace program." At the outset, the Board would note that it was limited in the conclusions that it could reach because GAO stated that it did not have the information requested. In addition, in determining whether the rights of a protected

group member were violated, a sound and complete analysis must include more than a comparison of the number of denials one group had compared to the number of denials another group had. A comparison of only denials fails to address the question of whether members of protected groups are not applying to particular programs because of perceived inequities in those programs, as suggested by the responses to the Board's survey. To know whether participation in the various alternative workplace arrangements is being administered within the spirit and letter of the law, GAO needs to maintain, at the very least, statistics on requests, approvals and denials. That data would permit relevant comparative analyses to be made.